

EXHIBIT C-1

Cavanagh, Matthew J.

From: Cavanagh, Matthew J.
Sent: Wednesday, November 6, 2024 4:05 PM
To: 'David Phillips'
Cc: Jim McCown
Subject: RE: [External] deposition

David,

I am not aware of any knowledge that Ms. Arnold would have relevant to a claim or defense in this action. Can you let me know what relevant testimony you seek from her so we can evaluate your request?

Thanks,
Matt

From: David Phillips <d.g.phillips@DavidGlennPhillips.com>
Sent: Wednesday, November 6, 2024 2:22 PM
To: Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>
Cc: Jim McCown <jmccown@vmdslaw.com>
Subject: [External] deposition

Matt,

I'd like to take the deposition of Christine Arnold who is an employee of WOIO/WUAB in the next two weeks. Please let know if your client will produce her as an employee or whether I need to issue a subpoena?

David Glenn Phillips
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